

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ALLY LANDAU et al.,

Plaintiffs,

v.

THE CORPORATION OF HAVERFORD
COLLEGE,

Defendant.

CIVIL ACTION

No. 2:24-cv-02044-GAM

**DECLARATION OF PLAINTIFF “HJSB” IN SUPPORT OF MOTION TO PROCEED
UNDER PSEUDONYMS**

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the following is true and correct:

1. I am the Plaintiff known as “HJSB” in the Amended Complaint filed in the above-captioned lawsuit.
2. I am a Jewish undergraduate student at Haverford College. I am a senior scheduled to graduate in May 2025.
3. I am requesting that this Court permit me to continue using the pseudonym “HJSB” during this litigation.
4. The reason that I want to continue using a pseudonym is simple: Since the October 7, 2023 attacks on Israel, Haverford has become an extremely hostile place for Jewish students, especially those who openly express support for Israel. If other Haverford students learned that I am a Plaintiff in this case, I expect that I would swiftly become a pariah on Haverford’s small campus, as well as a target for harassment and intimidation.

5. Since the October 7 attacks, I have been repeatedly insulted by other students at Haverford, who have attempted to tell me that my commitment to Israel has nothing to do with my religion. I have been shunned by Haverford students because I have taken the position that Israel has the right to exist as a Jewish state.

6. The climate for some Jews on Haverford's campus is so hostile that sometimes I have had to change my daily routine on campus. For example, I repeatedly have had to avoid individuals actively protesting Israel's response to the October 7, 2023 attacks.

7. The hostile atmosphere on campus has already adversely affected my academics at Haverford. For example, I was enrolled in a course in which my professor repeatedly and vocally expressed negative opinions about Israel. The course had nothing to do with Israel or religion generally. But because of my professor's inappropriate remarks, I skipped multiple classes. I have also avoided enrolling in courses taught by professors known to have expressed anti-Israel views.

8. If forced to identify myself in this case, I expect that my academic performance would suffer. Haverford has small, communal classes. Students are expected to work together in these courses. I know many of the people in my courses have viewpoints opposed to mine on the issues related to this case, and I expect that these classmates would refuse to work with me if they knew I was a Plaintiff in this case.

9. Haverford College is a very small school with only 1,400 students. The campus has only one cafeteria. All of its academic buildings and dorms are concentrated in a relatively small area. If my identity is revealed, it would be impossible, unlike at other larger schools, to simply avoid gatherings of people who welcome Israel-supporting Jews. There is no space in a

college of this size to seek comfort in numbers or to show up only at places where my position as a Plaintiff would not be known.

10. Given the high likelihood of retaliation if my involvement were known in this case, I have not told any Haverford students (with the exception of the other Plaintiffs) or employees that I am a Plaintiff in this case.

11. I am a private figure with little public exposure outside of Haverford's small campus.

12. If forced to proceed under my own name in this case—particularly while I remain a student at Haverford—I would have to reconsider serving as a Plaintiff.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
Nov 8, 2024.



"HJSB" SIGN 4W6RPV3V-15825PJK